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13 14 15	Attorneys for Plaintiff, OWEN DIAZ	240 Tamal Vista Blvd. Suite 100 Corte Madera, CA 94925 Telephone: (415) 767-0047 Facsimile: (415) 767-0037
16 17 18 19 20 21	OWEN DIAZ, Plaintiff,	DISTRICT COURT ICT OF CALIFORNIA Case No. 3:17-cv-06748-WHO JOINT STIPULATION REGARDING SCHEDULE AND PROCEDURES FOR
22 23 24 25	v. TESLA, INC. dba TESLA MOTORS, INC.; Defendant.	POST-TRIAL MOTION FOR ATTORNEY'S FEES; [PROPOSED] ORDER Trial Date: March 27, 2023 Judgment Entered: April 12, 2023
262728		

TO THE HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Civil Local Rule 7-12, Plaintiff Owen Diaz ("Plaintiff") and Defendant Tesla, Inc. ("Defendant"), by and through their attorneys of record, hereby submit this Joint Stipulation Regarding Schedule for Plaintiff's Motion for Attorney's Fees.

WHEREAS, on April 11, 2023, the Court entered Judgment in this matter following a verdict in a jury trial (Dkt. 417) that triggered the deadlines for the parties to file various post-trial motions, including Plaintiff's motion for attorneys' fees and expenses;

WHEREAS, Plaintiff intends to file a motion for attorneys' fees and expenses pursuant to 42 U.S.C. § 1988;

WHEREAS, the Court previously granted the parties' stipulation to extend the time for Plaintiff's motion for attorneys' fees and expenses until 14 days after the Court ruled on all of the parties' pending post-trial motions;

WHEREAS, the Court ruled on the parties' post-trial motions on October 4, 2023, making October 18, 2023 the deadline for filing Plaintiff's motion for attorneys' fees and expenses;

WHEREAS, the parties have met and conferred and agree that judicial economy and the schedules of counsel would benefit from an amended briefing and hearing schedule on Plaintiff's motion for attorney's fees.

NOW THEREFORE, it is stipulated by and between the parties that:

- Plaintiff shall file his motion for statutory attorney's fees and expenses no later than October 25, 2023;
- 2) Defendant shall file its opposition no later than November 17, 2023;
- 3) Plaintiff shall file his reply brief no later than December 4, 2023;
- 4) The Court's hearing on Plaintiff's motion shall be scheduled for January 10, 2024, or as soon thereafter is convenient for the Court.

IT IS SO STIPULATED.

1			CALIFORNIA CIVIL RI	GHTS LAW GROUP
2			ALEXANDER MORRIS ALTSHULER BERZON	
3			COLLIER LAW FIRM	LLI
4				
5	DATED: October 16, 2023	Ву	:/s Cimone Nunley	
6	DATED: October 10, 2023	Бу	•	
7			Lawrence A. Organ, Esq. Cimone A. Nunley, Esq.	
8			J. Bernard Alexander, Esc Marqui Hood, Esq.	q.
9			Michael Rubin, Esq.	
10			Jonathan Rosenthal, Esq. Dustin L. Collier, Esq.	
11			V. Joshua Socks, Esq. Elizabeth R. Malay, Esq.	
12			Drew F. Teti, Esq.	
13			Attorneys for Plaintiff OWEN DIAZ	
14				
15	DATED: October 16, 2023	OUIN	IN EMANUEL URQUHART	& SULLIVAN LLP
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17 18 19 20 21 22 23 24 25 26			/s Daniel Posner Kathleen M. Sullivan Daniel C. Posner Mari Henderson Asher Griffin Attorneys for Defendant	
17 18 19 20 21 22 23 24 25 26 27			/s Daniel Posner Kathleen M. Sullivan Daniel C. Posner Mari Henderson Asher Griffin Attorneys for Defendant	

[PROPOSED] ORDER Based upon the Parties' Stipulation, and good cause having been shown, IT IS HEREBY **ORDERED THAT:** 1) Plaintiff shall file his motion no later than October 25, 2023; 2) Defendant shall file its response no later than November 17, 2023; 3) Plaintiff shall file his reply brief no later than December 4, 2023; 4) Hearing on Plaintiff's motion shall be scheduled for January 10, 2024, or as soon thereafter is convenient for the Court. PURSUANT TO STIPULATION, IT IS SO ORDERED. Dated: ______, 2023 Hon. William H. Orrick

Dated: October 16, 2023

DECLARATION OF CONSENT

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest under penalty of perjury that I obtained concurrence in the filing of this document from above-listed counsel for Defendant Tesla, Inc., which shall serve in lieu of their signature on the document.

By: ____/s Cimone Nunley_

Lawrence A. Organ, Esq. Cimone A. Nunley, Esq. J. Bernard Alexander, Esq. Marqui Hood, Esq. Michael Rubin, Esq. Jonathan Rosenthal, Esq. Jonathan Rosenthal, Esq. Dustin L. Collier, Esq. V. Joshua Socks, Esq. Elizabeth R. Malay, Esq. Drew F. Teti, Esq. Attorneys for Plaintiff

OWEN DIAZ